

UNITED STATES DISTRICT COURT

for the
Western District of Texas**FILED**

April 15, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Adriana Quezada
DEPUTY

United States of America)

v.)

Case No.)

EP:25-MJ-1702-MATCynthia BETANCOURT)*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 13, 2025 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. 1324 (a)(2) and (a)(2)(B)(ii)

knowing and in reckless disregard of the fact that an alien has not received prior official authorization to come to, enter, or reside in the United States, brought to and attempted to bring to the United States in any manner whatsoever such alien, regardless of any official action which may later be taken with respect to such alien, for the purpose of commercial advantage and private financial gain.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Complaint sworn to telephonically on
April 15, 2025 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**
Complainant's signatureCarlos Valenzuela
CBP Enforcement Officer

Sworn to before me and signed in my presence.

Date: April 15, 2025City and state: El Paso, TexasMiguel A. Torres
United States Magistrate Judge

FACTS

That on or about April 13, 2025, the DEFENDANT Cynthia BETANCOURT a United States citizen, applied for admission into the United States (U.S.) via vehicle primary lane 4 at the Bridge of the Americas Port of Entry in El Paso, Texas, located in the Western District of Texas.

The DEFENDANT was the driver of a 2014 Chevrolet Traverse red in color bearing Texas license plates and was accompanied by three minor children. The DEFENDANT presented to Customs and Border Protection Officer (CBPO) Baca her Texas Driver's license bearing her name, date of birth and photograph. The DEFENDANT also presented Texas birth certificates on behalf of the three minor children and stated they were her children. CBPO Baca conducted queries on the DEFENDANT and received a computer-generated alert. CBPO Baca referred the DEFENDANT and her three minor children to vehicle secondary for further inspection.

In vehicle secondary, CBPO Ortega asked the DEFENDANT where she was going to which the DEFENDANT stated she was going back home to El Paso, Texas. CBPO Ortega asked the DEFENDANT what the purpose of her trip to Mexico was, and the DEFENDANT stated she went to pick up her kids. CBPO Ortega asked the DEFENDANT if the three minor children were her kids to which the DEFENDANT stated yes. CBPO Ortega escorted the DEFENDANT and her children to Passport Control Secondary (PCS) for further inspection.

In PCS, CBPO Velazquez began interviewing the DEFENDANT about the three minor children. The DEFENDANT voluntarily admitted to CBPO Velazquez that the two older kids did not belong to her and only the 10-month-old baby in the car seat was her son. The DEFENDANT admitted she was going to get paid \$ 1,500 USD to cross the two minor children and drop them off at an undisclosed location. The DEFENDANT was served with form I-214 Warning as to Rights (Spanish Version), which she read, understood, signed and requested legal representation. All questions were ceased at this time. It was later determined that the two minor children were Mexican nationals not in possession of any legal documents in which to enter, reside or seek employment in the United States.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

CRIMINAL AND IMMIGRATION RECORD

CRIMINAL RECORD:

09-19-2011- Convicted of Transport Aliens for Financial Gain- Received 36-month probation.

IMMIGRATION RECORD:

Subject is a United States Citizen.